1 2 3 4 5 6	LAW OFFICE OF MICHAEL HEUMANN Michael Heumann, CA SBN 299622 901 H Street, Suite 405-5 Sacramento, CA 95814 Telephone: (916) 426-6692 mikeheumann.law@gmail.com Attorney for Defendant STEVEN WOODS	
7	IN THE UNITED STATES DISTRICT COURT  EASTERN DISTRICT OF CALIFORNIA	
8		
9	UNITED STATES OF AMERICA,	Case No.: 2:21-cr-00100-JAM
0	Plaintiff,	
1	v.	MOTION AND ORDER TO CONTINUE JUDGMENT AND SENTENCING
12	STEVEN WOODS	
13	Defendants.	DATE: November 4, 2025 TIME: 9:00 a.m.
4		COURT: Hon. John A. Mendez
15	STIPULATION	
16	1. By previous order, this matter was set for sentencing on November 4, 2025.	
17	2. The defense moves to continue th	e sentencing date to December 9, 2025
8	3. This motion is based on the follow	ving:
9	a) When defense counsel wa	s initially appointed to represent Mr. Woods, he
20	explained that prior counsel, Ms. Mouzis, had hired a sentencing mitigation specialist, Ms. Grier,	
21	who he understood had prepared a report on mitigating factors to assist counsel during	
22	sentencing. At Mr. Woods' request, counsel attempted to contact Ms. Grier but was unable to	
23	reach her and ultimately the matter was set for sentencing.	
24	b) At the last hearing, Mr. Woods' mother wrote to the court expressing concern	
25	that, among other things, Ms. Grier's report had not been obtained, and following a discussion	
26	with the court Mr. Woods requested to continue the matter so that counsel could attempt to reach	
27	Ms. Grier and obtain the report once again.	
28	c) Defense counsel has now	been able to make contact with Ms. Grier, but learned

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that the report has not yet been prepared. Ms. Grier explained that she spent 10-15 hours working with Mr. Woods and gathering information at the request of Ms. Mouzis and was prepared to write the report to assist counsel, but then the case transferred from Ms. Mouzis to Ms. Soloman and she was no longer retained. Ms. Grier explained that she had the information ready and would be able to write the report to assist current counsel if desired.

- d) Defense counsel expects that the requested continuance will be sufficient to receive the report from Ms. Grier and prepare any supplementary memoranda necessary for sentencing..
- e) Counsel for defendants believes that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
  - f) The next date available for both counsel and the court is December 9, 2025.
- g) The government was informed of the defense request for a continuance and does not take a position on this motion.

Dated: October 29, 2025 /s/ MICHAEL HEUMANN

MICHAEL HEUMANN Counsel for Defendant STEVEN WOODS

**ORDER** 

Defendant's motion to continue is **GRANTED**. The Judgment and Sentencing set for November 04, 2025, is **CONTINUED** to **December 09, 2025**, at **09:00 a.m.**, before Senior District Judge John A. Mendez.

IT IS SO ORDERED.

Dated: October 29, 2025

OHN A. MENDEZ,

SENIOR UNITED STATES DISTRICT JUDGE